

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-SLR

(Securities Class Action)

Hon. Sue L. Robinson

ELECTRONICALLY FILED

**DECLARATION OF HANNAH G. ROSS
IN SUPPORT OF LEAD PLAINTIFFS' BRIEF IN SUPPORT OF THEIR MOTION TO
COMPEL PRODUCTION OF DOCUMENTS WITHHELD BY DEFENDANTS BASED
ON "THE BANK EXAMINATION" PRIVILEGE**

I, Hannah G. Ross, hereby state as follows:

1. I am a Partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP, Co-Lead Counsel for Court-appointed Lead Plaintiffs the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund, and Co-Lead Counsel for the shareholder Class in the above-captioned action. I am a member in good standing of the Bar of the State of New York and am admitted to appear *pro hac vice* in this action. I respectfully submit this declaration in support of the Lead Plaintiffs' Brief In Support Of Their Motion To Compel Production Of Documents Withheld By Defendants Based On "The Bank Examination" Privilege. I have personal knowledge of the facts set forth herein and, if called upon to do so, could and would competently testify thereto.

2. Annexed hereto are true and correct copies of the following:

<u>Exhibit</u>	<u>Description</u>
A.	Wilmington Trust Defendants' letter to Lead Plaintiffs, dated June 26, 2014.
B.	Lead Plaintiffs' letter to the Wilmington Trust Defendants, dated May 8, 2014.
C.	Lead Plaintiffs' letter to the Wilmington Trust Defendants, dated June 19, 2014.
D.	Wilmington Trust Defendants' letter to Lead Plaintiffs, dated June 30, 2014.
E.	Defendant KPMG's email to Lead Plaintiffs, dated July 7, 2014.
F.	Director Defendants' email to Lead Plaintiffs, dated July 7, 2014.
G.	Underwriter Defendants' email to Lead Plaintiffs, dated July 7, 2014.
H.	Defendant North's email to Lead Plaintiffs, dated July 11, 2014.
I.	Defendant KPMG's email to Lead Plaintiffs, dated July 24, 2014.
J.	Plaintiffs' letter to the Wilmington Trust Defendants, dated July 7, 2014.
K.	Wilmington Trust Defendants' letter to Lead Plaintiffs, dated July 25, 2014.
L.	Lead Plaintiffs' letter to the Federal Reserve System, dated June 4, 2014.
M.	The Federal Reserve System's letter to Lead Plaintiffs, dated June 27, 2014.
N.	Lead Plaintiffs' letter to the Office of the Comptroller of the Currency, dated July 11, 2014.
O.	Lead Plaintiffs' letter to the Delaware State Bank Commissioner, dated July 11, 2014.
P.	Wilmington Trust Defendants' email to Lead Plaintiffs, dated July 7, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 5th day of August 2014, in New York, New York.

/s/ Hannah G. Ross
HANNAH G. ROSS